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5 Attorneys for Plaintiff/Counter-defendant

6 **IN THE UNITED STATES DISTRICT COURT**
 7 **FOR THE DISTRICT OF NEVADA**

| | | |
|---|---|--|
| 8 KAL-MOR-USA, LLC, |) | Case No. 2:13-cv-01046-GMN-PAL |
| |) | |
| 9 Plaintiff, |) | STIPULATION TO EXTEND |
| |) | PLAINTIFF'S OPPOSITION DUE DATE |
| 10 vs. |) | TO INTERVENOR DEFENDANT |
| |) | RESIDENTIAL CREDIT SOLUTIONS, |
| 11 BANK OF AMERICA, N.A., a National |) | INC.'S MOTION FOR SUMMARY |
| 12 Association; FIDELITY NATIONAL TITLE |) | JUDGMENT |
| 13 INSURANCE COMPANY, a foreign |) | |
| 14 corporation; DOES I through X; and ROE |) | |
| 14 CORPORATIONS I through X, inclusive, |) | |
| |) | |
| 15 Defendants. |) | |
| |) | |
| 16 <hr/> RESIDENTIAL CREDIT SOLUTIONS, |) | |
| 17 INC. |) | |
| |) | |
| 18 Intervening Defendant. |) | |
| |) | |
| 19 <hr/> |) | |

20 **STIPULATION**

21 This Stipulation is entered into and agreed upon by Kal-Mor-USA, LLC ("Plaintiff"), by
 22 and through its counsel of record Raffi A. Nahabedian, of the Law Office of Raffi A. Nahabedian,
 23 as well as by Residential Credit Solutions, Inc. ("Defendant"), by and through its counsel of record
 24 Christina V. Miller, of the Law Firm Wright Finlay & Zak, LLP. The Stipulation is entered into as
 25 a means to allow Plaintiff additional time to file and serve its Opposition to Defendant's Motion for
 26 Summary Judgment. (ECF 88). The stipulated due date for the Opposition is December 22, 2017.
 27 The stipulated due date for the Reply be on or before January 8, 2018.
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1 This Stipulation for the extension of time is agreed upon and entered into in good faith by
2 the parties based on the parties good faith attempts to diligently resolve and settle the pending
3 lawsuit. Such additional time will allow the parties to prevent increased litigation costs and, indeed,
4 will reduce the burden on this Court by not having to entertain or hear matters that may and can be
5 resolved and settled in the near/immediate future.

6 **IT IS SO JOINTLY STIPULATED:**

7 DATED this 1st day of December 2017. DATED this 1st day of December 2017.
8 By: Raffi A. Nahabedian, Esq. By: Christina V. Miller, Esq.
9 Raffi A. Nahabedian, Esq. (SBN 09347) Dana Jonathon Nitz, Esq. (SBN 00050)
10 10655 Park Run Drive, Suite 210-B Christina V. Miller, Esq. (SBN 12448)
11 Las Vegas, NV 89144 WRIGHT, FINLAY & ZAK, LLP
12 Attorney for Plaintiff 7785 W. Sahara Avenue, Suite 200
13 KAL-MOR-USA, LLC Las Vegas, NV 89117
14 Attorneys for Intervenor,
15 RESIDENTIAL CREDIT SOLUTIONS, INC.

14 **ORDER**

15 The Stipulation hereinabove set forth is approved and GRANTED.

16 **IT IS SO ORDERED.**

17 Dated this 5 day of December 2017.



Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

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21 Respectfully Submitted By:
22 LAW OFFICE OF RAFFI A. NAHABEDIAN
23 By: Raffi A. Nahabedian, Esq.
24 Raffi A. Nahabedian, Esq.
25 Attorney for Plaintiff
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of December, 2017, service of the foregoing Stipulation was made this date by electronically serving, through the Court's/Court Clerk's CM/ECF e-file system, a true and correct copy of the same, to the following parties:

Jacob S. Smith, Esq.
Shawn L. Walkenshaw, Esq.
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**Attorneys for Intervenor,
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INC.**

/s/ Raffi A. Nahabedian, Esq.
An employee of Raffi A. Nahabedian

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